

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK-----
GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,	:	No. 07 CIV 6233 (PKC)
v.	:	ECF Case
MITSUBISHI ELECTRIC CORP.; MITSUBISHI ELECTRIC US HOLDINGS, INC.; MITSUBISHI ELECTRIC AND ELECTRONICS USA, INC.; MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.; SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS AMERICA, INC.,	:	NOTICE OF MOTION TO ADMIT COUNSEL <i>PRO HAC VICE</i>
Defendants.	:	

9-4-07 m6
#50
C26026

PLEASE TAKE NOTICE that, upon the annexed declarations of Philip A. Irwin, Richard L. Rainey, and Peter A. Swanson, and the exhibits attached thereto, and with the consent of counsel for Plaintiff Genoa Technologies, Ltd., Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., by and through their undersigned counsel, will move this Court, as soon as counsel may be heard, for an Order pursuant to Local Civil Rule 1.3(c) of this Court admitting Richard L. Rainey and Peter A. Swanson *pro hac vice* in connection with the above-captioned action, and for such other and further relief as the Court may deem just and proper.

COVINGTON & BURLING LLP



Philip A. Irwin
620 Eighth Avenue
New York, NY 10018
(212) 841-1000

Dated: New York, New York
September 4, 2007

*Attorneys for Defendants Samsung Electronics
Co., Ltd. and Samsung Electronics America,
Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENOA COLOR TECHNOLOGIES, LTD., : x
Plaintiff, :
v. : No. 07 CIV 6233 (PKC)
: ECF Case
: DECLARATION OF
: PHILIP A. IRWIN
MITSUBISHI ELECTRIC CORP.; MITSUBISHI
ELECTRIC US HOLDINGS, INC.; MITSUBISHI
ELECTRIC AND ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.,
Defendants. :
----- x

Pursuant to 28 U.S.C. § 1746, I, Philip A. Irwin, declare:

1. I am an attorney with the law firm of Covington & Burling LLP, attorneys for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I submit this declaration in support of Defendants' Motion to Admit Counsel *Pro Hac Vice* in connection with this action pursuant to Local Civil Rule 1.3(c).

2. By reputation and experience, I know Messrs. Rainey and Swanson to be attorneys of good character, competence, and experience. I am confident that they will conduct themselves accordingly before this Court.

3. In connection with this application, I am submitting declarations of Messrs. Rainey and Swanson in which they describe their experience and familiarity with the Judicial Code governing practice in the United States District Courts, Federal Rules of Civil Procedure, Federal Rules of Criminal Procedure, Federal Rules of Evidence, and Local Rules governing practice in this Court. Attached to the declarations as exhibits are Certificates of Good Standing issued within the last thirty days from the state bars in which Counsel are admitted.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENOA COLOR TECHNOLOGIES, LTD., : X
Plaintiff, :
v. : No. 07 CIV 6233 (PKC)
MITSUBISHI ELECTRIC CORP.; MITSUBISHI :
ELECTRIC US HOLDINGS, INC.; MITSUBISHI :
ELECTRIC AND ELECTRONICS USA, INC.; :
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.; :
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG :
ELECTRONICS AMERICA, INC., :
Defendants. :

Pursuant to 28 U.S.C. § 1746, I, Peter A. Swanson, declare:

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in this matter. My current office address is 1201 Pennsylvania Avenue, NW, Washington, DC 20004.

2. I submit this declaration in support of Defendants' Motion to Admit Counsel *Pro Hac Vice* in connection with the above captioned matter.

3. I have been admitted to practice law in Virginia since 2004 and in the District of Columbia since 2006. As shown in the Certificates of Good Standing annexed hereto as Exhibits A and B, I am currently a member in good standing of the bars of both Virginia and the District of Columbia.

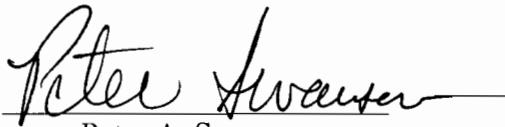
4. I have been admitted to practice in the following courts: United States Court of Appeals for the Federal Circuit. There are no pending disciplinary proceedings against me in any state or federal court.

5. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and the practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; and (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

6. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 30, 2007, in Washington, DC.



Peter A. Swanson

Howard W. Martin, Jr., President
 Crenshaw, Ware & Martin, P.L.C.
 1200 Bank of America Center
 Norfolk, VA 23510-2111
 Telephone: (757) 623-3000

Manuel A. Capsalis, President-elect
 Capsalis, Bruce & Reaser, P.L.C.
 2200 Wilson Boulevard, Suite 800
 Arlington, VA 22201
 Telephone: (703) 358-9620

Karen A. Gould, Immediate Past President
 McSweeney, Crump, Childress & Gould, P.C.
 11 South Twelfth Street
 Richmond, VA 23219
 Telephone: (804) 545-2415

George W. Chabalewski
 Bar Counsel



Virginia State Bar

Eighth and Main Building
 707 East Main Street, Suite 1500
 Richmond, Virginia 23219-2800
 Telephone: (804) 775-0500

Facsimile: (804) 775-0501 TDD: (804) 775-0502

August 22, 2007

CERTIFICATE OF GOOD STANDING

***THIS IS TO CERTIFY THAT PETER ANDREW SWANSON IS AN
 ASSOCIATE MEMBER OF THE VIRGINIA STATE BAR IN GOOD
 STANDING. MR. SWANSON WAS LICENSED TO PRACTICE LAW IN
 VIRGINIA ON OCTOBER 15, 2004, AFTER SUCCESSFULLY PASSING
 THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR
 EXAMINERS.***

SINCERELY,

The handwritten signature of Thomas A. Edmonds in black ink.

***THOMAS A. EDMONDS
 EXECUTIVE DIRECTOR AND
 CHIEF OPERATING OFFICER***

Thomas A. Edmonds
 Executive Director and
 Chief Operating Officer

Mary Yancey Spencer
 Deputy Executive Director

Elizabeth L. Keller
 Assistant Executive Director
 for Bar Services

Susan C. Busch
 Assistant Executive Director
 for Administration



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

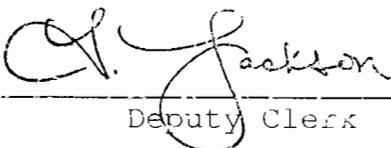
PETER A. SWANSON

was on the 3rd day of APRIL, 2006

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 14, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that I caused true copies of the foregoing Notice of Motion to Admit Counsel *Pro Hac Vice* dated September 4, 2007; the Declaration of Philip A. Irwin dated September 4, 2007 and the exhibit attached thereto; the Declaration of Richard L. Rainey dated August 29, 2007 and the exhibits attached thereto; the Declaration of Peter A. Swanson dated August 27, 2007 and the exhibits attached thereto; and the proposed Order Admitting Counsel Pro Hac Vice, to be served by United States Mail, first class postage pre-paid, on the following attorneys of record to the within action (No. 07 CIV 06233 (PKC)) on this 4th day of September, 2007.

Sibley P. Reppert
Lahive & Cockfield LLP
One Post Office Square
Boston, MA 02109

Lee A. Goldberg
Nathaniel Buchek
Pearl Cohen Zedek Latzer LLP
1500 Broadway, 12th Floor
New York, NY 10036

Attorneys for Plaintiff

Vincent J. Belusko
Morrison & Foerster
555 West 5th Street
Los Angeles, CA 90013-1024

James E. Hough
Morrison & Foerster
1290 Avenue of the Americas
New York, NY 10104-0050

Attorneys for Defendants Mitsubishi Electric Corp., Mitsubishi Electric US Holdings, Inc., Mitsubishi Electric and Electronic USA, Inc., and Mitsubishi Digital Electronics America, Inc.

Dated: New York, New York
September 4, 2007



Philip A. Irwin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Pursuant to 28 U.S.C. § 1746, I, Richard L. Rainey, declare:

1. I am a partner of the law firm of Covington & Burling LLP, counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in this matter. My current office address is 1201 Pennsylvania Avenue, NW, Washington, DC 20004.

2. I submit this declaration in support of Defendants' Motion to Admit Counsel *Pro Hac Vice* in connection with the above captioned matter.

3. I have been admitted to practice law in the District of Columbia since 1996 and in Georgia since 1997. As shown in the Certificates of Good Standing annexed hereto as Exhibits A and B, I am currently a member in good standing of the bars of both the District of Columbia and Georgia.

4. I have been admitted to practice in the following courts: United States Supreme Court, United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the Third Circuit, United States District Court for the District of Columbia, United

States District Court for the Northern District of Georgia, United States District Court for the District of Colorado. There are no pending disciplinary proceedings against me in any state or federal court.

5. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and the practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; and (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

6. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 24, 2007, in Washington, DC.



Richard L. Rainey



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

RICHARD L. RAINES

was on the 2nd day of December, 1996

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 13, 2007.

GARLAND PINKSTON, JR., CLERK

By: Rainey Clerk
Deputy Clerk



STATE BAR OF GEORGIA

Lawyers Serving the Public and the Justice System

Mr. Richard Lawrence Rainey
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004

CURRENT STATUS: Active Member-Good Standing

DATE OF ADMISSION TO PRACTICE: 10/31/1997

Attorney Bar Number: 592604

Today's Date: August 13, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

STATE BAR OF GEORGIA

Official Representative of the State Bar of Georgia

HEADQUARTERS

104 Marietta Street, Suite 100
Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
FAX (404) 527-8717
www.gabar.org

SOUTH GEORGIA

244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435